

### Reasonable adjustments policy

GrapeSmith will consider any reasonable adjustment requirement by a student or client provided it is supported by written evidence. During the education or consultation process this will include use of premises with suitable access and facilities to accommodate the student or client, as far as is reasonably practicable.

Stimuli likely to cause distress to those with autism will be removed or eliminated as far as is reasonably practicable. Where necessary, consideration will be given to one-to-one tuition. Prior to any examination, GrapeSmith will inform WSET of the student's request for reasonable adjustment, and comply with the subsequently agreed action.

This may include, but is not limited to, allowing additional time for a candidate, or providing a reader and/or scribe. In the latter case the person appointed as scribe and/or reader may not provide any additional help or coaching to the candidate, or take it upon themselves to interpret the meaning of any question or answer option.

### Special consideration policy

GrapeSmith undertakes to inform WSET in a timely manner of any circumstance that is likely to affect the performance of an examination candidate or group of candidates. This includes, but is not limited to, temporary illness or injury to an individual, emergency or other significant distraction during the examination. GrapeSmith will co-operate fully with WSET in ameliorating the impact of any such circumstances, including the provision of a replacement exam if necessary.

### Cancellations & Refunds

A full refund is available for cancellations up to 30 days in advance of the course start date. Cancellations made less than 30 days but more than 14 days in advance of course start date will be entitled to a 50% refund. If we are able to fill the place before course commences a 100% refund will be issued.

Cancellations made less 14 days in advance of course start date have no entitlement to a refund. If we can fill the space on the course we may offer a 50% refund at our discretion.

### Data Protection

This Privacy Notice explains what happens to the personal data that you provide to us.

**SECTION 1 - WHAT DO WE DO WITH YOUR INFORMATION?** We collect the personal information you give us such as your name, address and email address. This will only be stored and used for the purpose for which it was provided. All personal data will be deleted once it is no longer needed for the purpose for which it was provided. Only with your permission, will we send you emails about our store, new products and other updates.

**SECTION 2 - CONSENT** How do you get my consent? When you provide us with personal information to complete a transaction, verify your credit card, place an order, arrange for a delivery or return a purchase, we imply that you consent to our collecting it and using it for that specific reason only. If we ask for your personal information for a secondary reason, like marketing, we will either ask you directly for your expressed consent, and provide you with an opportunity to say no. How do I withdraw my consent? If after you opt-in, you change your mind, you may withdraw your consent for us to contact you, for the continued collection, use or disclosure of your information, at any-time, by contacting me [barnaby@grapesmith.co.uk](mailto:barnaby@grapesmith.co.uk)

**DISCLOSURE** We may disclose your personal information if we are required by law to do so or if you violate our Terms of Service.

**SECTION 4 - THIRD-PARTY SERVICES** In general, the third-party providers used by us will only collect, use and disclose your information to the extent necessary to allow them to perform the services they provide to us and in the circumstances detailed below:

1. In the event that we sell any or all of our business to the buyer.
2. Where we are legally required by law to disclose your personal information.
3. To further fraud protection and reduce the risk of fraud.
4. To provide our suppliers with data they require to ensure delivery of your product or service. Should we supply your data to a supplier we will seek to ensure they have a nominated data controller. Any other data controller will ensure that your personal data is only used for the purposes of delivering products or services, and not for marketing purposes. However, certain third-party service providers, such as payment gateways and other payment transaction processors, have their own privacy policies in respect to the information we are required to provide to them for your purchase-related transactions. For these providers, we recommend that you read their privacy policies so you can understand the manner in which your personal information will be handled by these providers.

**SECTION 5 - SECURITY** To protect your personal information, we take reasonable precautions and follow industry best practices to make sure it is not inappropriately lost, misused, accessed, disclosed, altered or destroyed. If you provide us with your credit card information, the information is encrypted using secure socket layer technology (SSL) and stored with a AES-256 encryption. Although no method of transmission over the Internet or electronic storage is 100% secure, we follow all PCI-DSS requirements and implement additional generally accepted industry standards.

**SECTION 6 - AGE OF CONSENT – WSET** Courses involve the consumption of alcohol and therefore are not available to persons under the age of 18 (eighteen). Supplementary Photographic ID may be requested if there is any doubt that a candidate is of sufficient age.

**SECTION 7 – DATA CONTROLLER** We have a nominated individual who controls and is responsible for the keeping and use of your personal information. This person is called a data controller. Their contact email for these purposes is [barnaby@grapesmith.co.uk](mailto:barnaby@grapesmith.co.uk).

**SECTION 8 - RIGHT TO WITHDRAWAL** You have the right to withdraw your personal data at any time that you wish to do so. If you decide that you no longer wish us to hold your personal data, then please contact our data controller with your request.

**SECTION 9 – ACCESS TO INFORMATION** In accordance with Section 7 of the Data Protection Act 1998 you have the right to access any information that we hold relating to you. This is commonly referred to as a subject access request. Please note that we reserve the right to charge a fee of £10 to cover the costs incurred by us in providing you with the information.

**SECTION 10 - COMPLAINTS** Should you be concerned that your information has not been handled correctly, such as being lost or disclosed to others without your permission, then you have the right to complain. You should contact our data controller Barnaby on [barnaby@grapesmith.co.uk](mailto:barnaby@grapesmith.co.uk) or your WSET Contact Polly [polly@grapesmith.co.uk](mailto:polly@grapesmith.co.uk) outlining your concerns and we will try to resolve the matter with you. Should you feel that you wish to escalate your complaint then you should contact the Information Commissioners Office, details below: [www.ico.org.uk](http://www.ico.org.uk) Telephone 0303 123 1113

**CHANGES TO THIS PRIVACY POLICY** We reserve the right to modify this privacy policy at any time, so please review it frequently. Changes and clarifications will take effect immediately upon their posting on the website. If we make material changes to this policy, we will notify you by email that it has been updated, so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we use and/or disclose it. If our store is acquired or merged with another company, your information may be transferred to the new owners so that we may continue to sell products to you.

**QUESTIONS AND CONTACT INFORMATION** If you would like to: access, correct, amend or delete any personal information we have about you, register a complaint, or simply want more information contact our Privacy Compliance Officer [barnaby@grapesmith.co.uk](mailto:barnaby@grapesmith.co.uk)

### Complaints Policy

Complaints against any action or practice which threatens the integrity of our courses, either APP centre staff, or representative, or student should in the first instance be discussed with APP centre contact Polly Wood; either in person, or by emailing [polly@grapesmith.co.uk](mailto:polly@grapesmith.co.uk). GrapeSmith undertakes to investigate all complaints in a thorough and professional manner and will endeavour to respond to your initial complaint within 2 working days. This response includes, but is not limited to:

- Notifying the complainant that their complaint will be investigated by a named individual within a given timescale
- Informing the complainant of the outcome of the investigation in writing
- Informing the complainant of the appropriate escalation of the complaint if the initial outcome is still unsatisfactory.

An outline of the problem and the main points should be documented and dated.

If the problem is not resolved at this stage the candidate should contact Grapesmith Manager Barnaby Smith; [barnaby@grapesmitgh.co.uk](mailto:barnaby@grapesmitgh.co.uk) or the WSET.

Examples of complaints would be

- Dis-satisfaction with teaching, facilities or administration of WSET courses
- Allegations of discrimination or unfair treatment
- Falsifying results, assisting candidates with answers
- Allowing unauthorised material into the exam room e.g. phones, notes etc
- Allowing candidates to copy from each other.
- Disruptive behaviours e.g. talking during the exam

### Complaints against the awarding body,

Complaints against the Wine and Spirit Education Trust should, in the first instance, be discussed with the centre contact as above and documented evidence will then be forwarded to The Wine and Spirit Education Trust who have their own complaints policy.

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Candidates who are unhappy with their exam results can appeal via the centre contact, Polly Wood  
polly@grapesmith.co.uk

The Wine and Spirit Education Trust will investigate the charges are on the website:

[www.wsetglobal.com](http://www.wsetglobal.com).

### Equal Opportunities Policy

GrapeSmith fully supports the principles of Equal Opportunities. We strive to ensure that all candidates for our qualifications are treated fairly and on an equal basis.

GrapeSmith is an equal opportunities organisation and will consider applications from any organisation or individual who can demonstrate that they meet our approval criteria. This policy is available on our website and will be provided to any student on demand.

### Diversity & Equality

Grapesmith will work to ensure there are no barriers to entry to units and qualifications, which we deliver and/or offer, for disabled people, women or men, or people from different racial groups, other than those directly related to the integrity of the units or qualifications. The nature of any barriers will be stated and the inclusion of the requirements that create the barrier justified only and explicitly in terms of the integrity of the unit or the qualification. Details of how the effect of any barriers will be mitigated will be recorded, including using access arrangements or including reasonable adjustments. For instance; the classroom is currently located upstairs, without access to wheelchair candidates. Should a wheelchair user wish to study WSET courses at GrapeSmith we would facilitate a classroom situation on the ground floor, where access is possible.

We will:

Conduct anonymous assessment of examination candidates wherever possible;

Promote practices and procedures that give equal opportunities to everyone;

Have equal opportunity policies in place; for instance assisting candidates with audio/visual difficulties.

Consider the variation of any conventional rules and regulations for the conduct of examinations which might inhibit the performance of candidates with specific needs, provided that the standard, quality and integrity of the assessment is not compromised.

Make every effort to ensure that there is equality of opportunity in its assessment process, regardless of the candidate's gender, age, racial origin, religious persuasion, sexual orientation or disability;

Ensure, to the best of our ability, that any documentation produced does not contain language or images which may be regarded as offensive or stereotypical, and that they reflect the diversity of contemporary society.

### Conflicts of Interest Policy

GrapeSmith is approved by WSET Awards which is subject to regulation by the UK Government's regulator, OfQual. As a regulated awarding organisation, we are required to identify, monitor and

manage all conflicts of interest which may have an adverse effect on the qualifications we offer and we must take all reasonable steps to mitigate such adverse effect where it exists.

This document defines what is meant by conflict of interest, describes such conflicts of interest in the context of working with WSET Awards, identifies those conflicts of interest that can be managed and are therefore acceptable and those that cannot be managed and are therefore unacceptable. It also gives examples of potential conflicts of interest.

#### Definition of conflict of interest

A conflict of interest exists where an individual has interests or loyalties that could adversely influence their judgement, objectivity or loyalty to WSET Awards when conducting activities associated with our qualifications. These can arise in many different aspects of awarding organisation activity, such as:

- An individual whose personal interests or loyalties conflict with their awarding organisation involvement.
- An individual who receives remuneration for services that conflict with their awarding organisation involvement.
- An individual whose acts put WSET Awards in a position of non-compliance with its regulatory responsibilities.

Specific examples of conflicts of interest include the following:

- The undertaking of any assessment of candidates by an individual who has a personal interest in the result of the assessment for any or all individuals concerned.
- The undertaking of any moderation of assessment of candidates by an individual who has a personal interest in the result of the assessment for any or all individuals concerned.
- The tutoring of candidates by any individual involved in the assessment process.
- The undertaking of a WSET-regulated qualification by any individual employed by an APP.
- The undertaking of a WSET-regulated qualification by any individual employed by WSET Awards.
- The invigilation of a WSET-regulated qualification by any individual involved in the delivery of training leading to the assessment.
- The delivery of “coaching sessions” to examination candidates by any individual involved in the assessment of candidate scripts or the authoring of examination questions.
- The employment by an APP of individuals engaged in the delivery of taught programmes or in the role of Internal Assessor in another APP.

#### Malpractice, Maladministration and Sanctions Policy

GrapeSmith will ensure that their programme for the delivery and administration of any WSET qualification complies in all respects to the rules, regulations and procedures set out in the WSET APP Operating Handbook. All WSET<sup>®</sup> examinations run by GrapeSmith will be administered in line with the Centre Agreement, Code of Practice and Invigilation Instructions provided in the Operating handbook, and Examination Regulations issued to all APPs and Students in the Qualification Specifications. Failure to abide by these criteria will be considered Malpractice and or Maladministration and may affect our ability to continue teaching WSET qualifications. Malpractice can arise from any act, omission, event, incident or circumstance that prejudices learners, affects public confidence in qualifications, affects the standards of qualifications which the awarding body

makes available or affects the ability of the awarding body to undertake the development, delivery or award of qualifications. Maladministration relates to a failure by the APP to offer WSET Qualifications in accordance with the rules, regulations and operating procedures set out in the WSET Handbook.

Malpractice will include, but is not limited to:

- a) Actual or attempted Plagiarism, or cheating, of any nature by candidates;
- b) Use or attempted use of any reference material or electronic device during a closed book examination
- c) Disruptive behaviour by candidates in the examination;
- d) Candidates in breach of published Examination Regulations and APP in breach of invigilation rules or the Code of Conduct;
- e) Fraudulent use of WSET<sup>®</sup> certificates;
- f) A deliberate attempt to discredit the WSET<sup>®</sup>, or to bring the WSET<sup>®</sup> into disrepute in any way;
- g) Issue of bogus examination results;
- h) Insecure storage of examination papers;
- i) Unauthorised amendment, copying or distribution of examination papers;
- j) Use of unapproved or ineligible educators to deliver a qualification course, or use of unauthorised internal assessors
- k) Change of examination location or altered facilities so they no longer meet the required standards;
- l) Failure to administer examination in line with the assessment requirements;
- m) Denial of access to resources (premises, records, information, candidates and staff) by authorised WSET<sup>®</sup> representatives and / or the Regulatory Authorities;

Maladministration will include, but is not limited to:

- a) Failure to follow procedures or adhere to regulations as laid out in the APP Operating Handbook;
- b) Failure to return examination papers within the required timeframe or
- c) Returning exam papers by regular post and not recorded delivery or trackable courier;
- d) Failure to issue results to candidates in a timely manner
- e) Breach or infringement of WSET<sup>®</sup> copyright and trademarks;
- f) Non-payment of fees for WSET<sup>®</sup> services or examinations;
- g) Breach of the Conflicts of Interest Policy
- h) Breach of the Centre Agreement or APP Code of Conduct;
- i) A change in control of the APP that results in new management being unable to meet WSET<sup>®</sup> Awards criteria;

GrapeSmith will report any potential case of malpractice by candidates, educators, invigilators or centre staff to the Centres Co-ordinator and Quality Assurance Manager at WSET® Awards immediately using the [Notification of Potential Malpractice Form](#).

The APP Main Contact (Polly Wood) is responsible for ensuring that all staff involved in the delivery and / or administration of the WSET® programme run it in accordance with the rules, regulations and procedures set out in this manual, and are aware of, and comply with, this policy. We, GrapeSmith, will use best endeavours of controls and checks that in our opinion are adequate to minimise and identify any instances of malpractice and is fit for purpose of reporting and investigating any alleged malpractice, in order to uphold the reputation and credibility of the WSET and ourselves as an APP.